

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CARNEGIE INSTITUTION OF WASHINGTON,

M7D CORPORATION,

Plaintiffs,

v.

PURE GROWN DIAMONDS, INC.,

IIA TECHNOLOGIES PTE. LTD D/B/A

IIA TECHNOLOGIES,

Defendants.

Civil Action No. 1:20-cv-00189-JSR

CARNEGIE INSTITUTION OF WASHINGTON,

M7D CORPORATION,

Plaintiffs,

v.

FENIX DIAMONDS LLC,

Defendant.

Civil Action No. 1:20-cv-00200-JSR

**DECLARATION OF MATTHEW J. MOFFA IN SUPPORT OF
REPLY MEMORANDUM OF LAW IN SUPPORT OF
PLAINTIFFS' MOTIONS TO DISMISS**

I, **MATTHEW J. MOFFA**, do declare and state as follows:

I am an attorney at Perkins Coie LLP licensed to practice law in the State of New York and counsel for plaintiffs Carnegie Institution of Washington and M7D Corporation (collectively,

“Plaintiffs”) in the present action. I make this Declaration based on my personal knowledge and in support of the *Reply Memorandum of Law in Support of Plaintiffs’ Motions to Dismiss*.

1. Attached as Exhibit 8 is a true and correct copy of correspondence from Paul Kokulis dated April 30, 2009.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 28, 2020

By: 
Matthew J. Moffa